

REMARKS

Applicant respectfully requests reconsideration of the present application in view of this response. Claims 1-19 are pending in the present application; claim 1 has been amended and claims 1, 14, 15, and 19 are independent claims.

CLAIM OBJECTION

The Examiner has objected to claim 1 due to informalities resulting from a minor typographical error. Applicants have amended claim 1 to correct the minor typographical error, and thus, request withdrawal of this objection.

PRIOR ART REJECTION

Rejection under 35 U.S.C. §103(a)

Claims 1-19 stand rejected under 35 U.S.C. §103(a) as allegedly being unpatentable over Teitzel et al. (U.S. Patent No. 5,533,170, hereinafter referred to as "Teitzel") in view of Pulli et al. (U.S. Patent No. 6,078,331, hereinafter referred to as "Pulli"). This rejection is respectfully traversed.

On page 4 of the Office Action, the Examiner recognizes that Teitzel fails to teach at least, "a first conversion step fracturing the input data into writing fields including at least a portion of a writing swath," and performing a second conversion step in at least two of the beam processor units "operating simultaneously but on different writing fields," as set forth in claim 1. The Examiner relies upon Pulli to allegedly teach these features.

Initially, the Examiner relies upon column 16, lines 1-45 of Pulli to allegedly teach "[a] method for writing patterns on a light sensitive surface." Applicant disagrees. Within the entire cited portion of Pulli only lines 40-45 of column 16 discuss pattern writing methods. In particular, lines 40-45 of Pulli discuss a laser printer device coupled to bus 201.

However, laser printers write on paper, which is clearly **not** a light sensitive surface. Thus, contrary to the Examiner's position, the cited portion of Pulli fails to teach "[a] method for writing patterns on a light sensitive surface," as set forth in claim 1. In addition, the abstract is completely silent about writing patterns on a light sensitive surface.

The Examiner relies upon column 6, lines 14-64 and column 11 line 52-column 12 line 33 of Pulli to allegedly teach, "a first conversion step, fracturing the data into writing fields including at least a portion of the writing swath," as set forth in claim 1. Applicant disagrees.

In an example-non-limiting embodiment of the present invention, a first conversion step may be performed by a processor 311 as shown in FIG. 3. For example, the processor 311 may fracture or cut input data (e.g., a shape to be written) into **writing fields (e.g., a plurality of shapes) to be written individually** on a light sensitive surface 301.

To the contrary, however, the subdivision process of Pulli (e.g., as discussed in col. 6, ll. 14-64) is merely a process in which a 3-D computer system may generate a polygon mesh approximation of a real-life object. More particularly, according to the subdivision process in Pulli, the polygon mesh approximation is produced by iteratively subdividing polygons (i.e., adding new polygon vertices) until a limit is reached.¹ This subdivision process does not, however, fracture any "input data into **writing fields** including at least a portion of a writing swath," as required by claim 1.

Thus, Pulli fails to teach the "first conversion step," of claim 1.

The Examiner relies upon column 7 line 41-column 8 line 3 of Pulli, to allegedly teach "performing the second conversion step in at least two beam processor units, operating simultaneously but on different writing fields," as set forth in claim 1. However, this section of Pulli also refers to the subdivision process, which as discussed above, is performed on a single polygon. Thus, even assuming that the subdivision process of Pulli did constitute the "second conversion step," of claim 1 (which Applicant does not admit), the subdivision process is not performed in at least two beam processors "**simultaneously** but on different writing fields," as required by claim 1. Thus, Pulli also fails to teach "performing the second conversion step," as set forth in claim 1.

¹ Col. 6, lines 49-54 of Pulli.

For at least the above reasons, even assuming *arguendo* that Teitzel could be combined with Pulli (which Applicant does not admit), the alleged combination would still fail to teach all of the features of claim 1. Thus, claim 1 is in condition for allowance. Claims 14, 15 and 19 are also in condition for allowance for at least reasons somewhat similar tot those discussed above with regard to claim 1. Claims 2-13 and 16-18 are allowable at least by virtue of their dependency from claims 1 and 15.

CONCLUSION

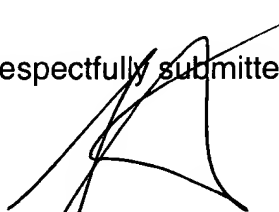
Accordingly, in view of the above amendments and remarks, reconsideration of the objections and rejections and allowance of each of claims 1-19 in connection with the present application is earnestly solicited.

Should there be any outstanding matters that need to be resolved in the present application; the Examiner is respectfully requested to contact John A. Castellano at the telephone number of the undersigned below.

If necessary, the Commissioner is hereby authorized in this, concurrent, and future replies, to charge payment or credit any overpayment to Deposit Account No. 08-0750 for any additional fees required under 37 C.F.R. § 1.16 or under 37 C.F.R. § 1.17; particularly, extension of time fees.

Respectfully submitted,

By



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